

March 30, 2012

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
PROTECTIVE ORDER IN WC DOCKET NOS. 10-90 AND 05-337 BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION – REDACTED FOR PUBLIC
INSPECTION**

BY HAND DELIVERY & ELECTRONIC FILING

FILED/ACCEPTED

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

MAR 30 2012
Federal Communications Commission
Office of the Secretary

Re: *Wireline Competition Bureau Seeks Comment on Potential Data
for Connect America Fund Phase One Incremental Support, FCC
Public Notice in WC Dockets 10-90 and 05-337, DA 12-137
(Wireline Competition Bur., rel. Feb. 6, 2011) (“CAF I Wire
Center Public Notice”);
Second Protective Order in WC Docket Nos. 10-90 and 05-337,
DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012)*

Dear Ms. Dortch:

Pursuant to the *CAF I Wire Center Public Notice* and *Second Protective Order* cited above, Alaska Communications Systems Group, Inc., on behalf of its four incumbent local exchange carrier subsidiaries (“ACS”), hereby supplements the data it filed on February 29 and March 9, 2012, to be used in the calculation of the incremental support amounts that will be made available under the Connect America Fund (“CAF”) Phase I mechanism.

ACS previously calculated the number of business locations in each wire center, the total customer locations (business plus residential) in each wire center, the square mileage of each wire center, the total number of road feet in each wire center, and the distance to the nearest adjacent wire center as requested in paragraph 4 of the *CAF I Wire Center Public Notice*. Upon request of the staff, ACS has further broken the data down to the *census block* level for each ACS wire center (using centroids to assign census blocks to their corresponding wire centers).

Previously ACS estimated the number of business locations relative to households in each wire center. In the data filed today, ACS has updated the business locations based on data from commercially available sources. These data have allowed

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ACS to determine the number of business locations at the census block level, which are presented here, rolled up by wire center.

With this filing, ACS provides the data necessary for calculation of support using the high-cost model consistent with the FCC's approach. The spreadsheet attached hereto provides these data as well as the density for each ACS wire center, representing the sum of the densities of each census block with a centroid in the wire center.

Certain of the information filed herewith is proprietary and highly confidential to ACS. If released to competitors or others with whom ACS does business, it could allow those persons to gain a significant advantage in the marketplace or in negotiations. It meets the definition of Highly Confidential Information set forth in the Second Protective Order cited above. Therefore, ACS has marked each page of its Stamped Highly Confidential Documents with the legend required in paragraph 5 of the Second Protective Order, indicating it is Highly Confidential Information, and has indicated that the documents contain such sensitive information that the copying of the Stamped Highly Confidential Documents is restricted, as provided for in paragraph 6 of the Second Protective Order.

ACS is filing herewith one copy of ACS's Stamped Highly Confidential Documents as defined in the Second Protective Order, and two redacted copies. ACS also provides two copies of each Stamped Highly Confidential Document for Katie King. Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann
*Counsel for Alaska Communications Systems
Group, Inc.*

cc: Steven Rosenberg, Wireline Competition Bureau
Katie King, Special Counsel, Telecommunications Access Policy Division
("TAPD"), Wireline Competition Bureau
Joseph Cavender, TAPD, Wireline Competition Bureau
Charles Tyler, TAPD, Wireline Competition Bureau

		Road Feet Roll -	Business Locations Roll-	Census Block Square Miles Roll-up	Density by Census Block (HH + Bus)/Sq Miles Roll-Up	Distance in Feet to Adj. Wire center
	HH Roll-up	up	up			
1 AKHKAKXADS1	27	19,173		7.769		198,825
2 AKTNAKXADS1	44	-		1.418		192,021
3 ANCRAXKXADS1	10,285	1,141,695		6.954		8,348
4 ANCRAXKXADS1	21,499	1,866,640		10.770		25,920
5 ANCRAXKXADS1	18,502	1,892,245		10.689		8,348
6 ANCRAXKXADS1	2,659	601,258		34.512		8,348
7 ANCRAXKXADS1	8,091	2,193,992		46.070		8,348
8 ANCRAXKXADS1	19,807	2,643,675		35.832		17,027
9 ANCRAXKXADS1	14,593	1,840,987		18.983		15,394
10 ANGNAXKXADS1	211	293,453		52.384		161,856
11 ATKAAXKXADS1	41	144,503		4.371		558,755
12 BRCYAKXADS1	10	174,806		934.430		198,755
13 CFCVAKXADS1	162	782,466		4.898		96,351
14 CGLGAKXADS1	66	39,726		13.772		26,081
15 CGLKAKXADS1	48	52,315		6.987		51,787
16 CGNKAKXADS1	103	69,977		11.366		26,081
17 DGLSAKXARS1	2,419	416,765		75.453		8,348
18 DLJTAKXADS1	517	4,787,645		16.824		25,267
19 EFCVAKXADS1	28	47,667		10.205		88,556
20 EGEKAKXADS1	223	303,503		2,177.051		230,029
21 EHBAAKXADS1	73	34,810		8.385		14,934
22 ELMNAKXARS1	1,435	1,051,223		20.022		25,920
23 ELSNAKXADS1	842	237,419		22.468		50,090
24 FLPSAKXADS1	36	43,500		12.764		202,094
25 FRBNAKXADS1	24,558	13,169,917		265.259		17,432
26 FTGRAKXARS1	364	331,736		159.869		25,267
27 FTRCAKXARS1	1,845	1,154,828		79.052		27,789
28 FTWRAKXADS1	2,121	1,046,779		1,202.798		17,432
29 GRWDAKXARS1	1,393	1,145,425		178.736		56,498
30 GSTVAKXADS1	488	463,231		32.814		124,333
31 HGHSAXKXADS1	40	555,270		3.011		320,414
32 HOMRAKXADS1	3,786	4,450,404		67.825		127,597
33 HONHAKXADS1	399	671,528		5.970		124,333
34 HTCVAKXADS1	161	49,720		8.318		61,801
35 HUSLAKXADS1	105	134,966		11.152		351,205
36 INDNAKXARS1	90	222,955		1.073		56,498
37 IVBAAXKXADS1	12	5,465		4.193		69,508
38 JUNEAKXADS1	1,877	315,417		916.268		213,882
39 JUNEAKXBRS1	1,165	182,043		31.202		18,668
40 JUNEAKXSRS1	5,234	1,480,897		31.822		18,668
41 KAKEAKXADS1	290	539,431		8.962		204,344
42 KASNAKXADS1	44	216,695		6.001		60,201
43 KENAAKXADS1	3,466	2,338,947		36.682		31,058
44 KHNAKXADS1	65	76,963		20.826		127,258
45 KLTGAKXADS1	87	97,646		21.590		188,460
46 KLWKAKXADS1	369	486,970		59.269		31,370
47 KODKAKAGRS1	355	601,169		23.181		30,697
48 KODKAKXCDS1	2,178	706,221		3.487		30,697
49 KRLKAKXADS1	18	17,665		10.817		88,225
50 KYKAKXADS1	54	52,878		5.603		88,304
51 LRBAAXKXADS1	70	44,173		5.390		88,225
52 MSHKAKXADS1	56	266,033		50.631		242,380

		Business		Density by Census	Distance in Feet
	HH Roll-up	Road Feet Roll - up	Locations Roll-up	Block (HH + Bus)/Sq Miles Roll-Up	to Adj. Wire center
53 NCHKAKXARS1	972	1,705,367		207.192	95,625
54 NDLTAKXADS1	94	26,579		8.212	84,033
55 NENAAKXADS1	215	772,275		5.857	88,886
56 NKENAKXARS1	1,981	3,700,365		68.805	67,120
57 NKLIAXADS1	23	178,360		132.051	615,443
58 NLLGAKXADS1	32	19,890		188.116	303,901
59 NRPLAKXADS1	10,707	9,519,059		236.234	50,090
60 NRWYAKXADS1	35	1,383,924		2.350	114,675
61 NULTAKXADS1	134	125,544		41.564	88,304
62 OLHBAKXADS1	105	956,595		20.531	187,904
63 OUZNAKXADS1	88	68,243		5.460	53,456
64 PDBAKXADS1	33	306,049		17.055	127,815
65 PLCNAKXADS1	77	131,869		0.604	88,556
66 PLPTAKXADS1	65	74,643		14.165	261,677
67 PNBKAKXADS1	18	132,498		0.879	10,018
68 PTAHAKXADS1	74	31,140		22.645	134,116
69 PTALAKXADS1	64	23,738		3.470	214,657
70 PTGMAKXADS1	108	43,569		6.388	14,934
71 PTPRAKXADS1	43	74,125		3.724	10,018
72 PYVLAKXADS1	50	187,070		11.155	69,508
73 SITKAKXADS1	3,897	768,211		11.983	233,260
74 SLDTAKXADS1	11,049	7,438,292		250.568	31,058
75 SLDVAKXARS1	218	504,404		0.366	40,762
76 STGRAKXADS1	61	97,004		34.750	262,225
77 STPLAKXADS1	190	199,434		40.314	262,225
78 THBYAKXADS1	333	1,541,125		19.808	58,724
79 TKSPAKXADS1	180	726,943		14.185	130,385
80 YKUTAKXADS1	383	1,660,272		100.486	717,622
Grand Total	183,640	83,901,404		8,265.09	9,507,028.23